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VIA ECF

Hon. James R. Cho
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Karnes et al v. City of New York et al., 21-CV-4903 (WFK) (JRC)

Your Honor:

Plaintiffs' counsel, with consent of defense counsel, respectfully requests additional time to provide information to defendants' counsel to see if the parties can reach an amicable resolution to this matter. As You Honor may recall, settlement was reached by two of the four plaintiffs in the matter on December 13, 2024. The parties jointly move the court for an additional 60 days to provide a report to Your Honor about the status of settlement negotiations.

As you recall, at the time of the settlement conference, the defendants sent counsel a list of issues and questions that they had with respect to the remaining plaintiffs. This list was extremely helpful in clarifying what information the plaintiffs need to provide to the defendants to see if there can be a resolution. As discussed in our letter of January 16, 2024, to effectively answer the questions raised by Mr. Francolla, we are sending Mr. Petree and Ms. Washam to see additional experts.

These experts have been engaged, documents have been provided and appointments with the plaintiffs are scheduled to take place in the next two weeks. Understanding the timeline to get a report from an expert, it seems unlikely that we will have a significant update in 30 days. However, if we report back in 60 days, I am optimistic that we can have the reports to the defendants with enough time for them to have an opinion on if it changes their settlement position.

The parties thank the Court for its attention to this matter.

Respectfully submitted,



David B. Rankin